

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

WILLIAM AMES, JR

and

LAURIE BRAUN,

Plaintiffs and next of kin to the
deceased, William D. Ames, III,

and

ESTATE OF WILLIAM D. AMES, III,
DECEASED,

v.

ST. FRANCOIS COUNTY SHERIFF'S
DEPARTMENT, ST. FRANCOIS COUNTY,

and

HARDY WHITE, JACOB LUNSFORD,
DILLON SANSOUCIE, KEVIN DAVIS,
TIM HANSEN, LUKE NICKELSON,
ALICIA HODGE, ZERICK HAHN,
DENNIS W. SMITH, and
HEATHER KATHERINE SMITH,

individually and in their official capacities,

Defendants.

Case No. 4:19-cv-00173-SCR

JURY TRIAL DEMANDED

MOTION TO AMEND SCHEDULING ORDER

COME NOW Plaintiffs, by and through counsel, and hereby moves this Court for an Order to amend the Court's Case Management Order of August 27, 2019 to change the deadline for submission of Expert Reports and to extend the other deadlines of the Case Management Order by sixty (60) days; and as support of same, Plaintiffs state as follows:

1. Plaintiffs' counsel was recently hospitalized and diagnosed with a serious illness which requires extensive treatment over the next several months.
2. Plaintiffs must seek additional counsel, who will need time to review this case and become familiar with the facts in order to assist with discovery and litigation.
3. Certain facts have arisen that must be explored via discovery and thereafter reviewed by Plaintiffs' experts, which will cause a delay in the filing of Plaintiffs' Expert Reports that were due today, January 10, 2020.
4. Plaintiffs believe that they will be able to obtain additional legal counsel within sixty (60) days.
5. Plaintiffs believe that they will be able to submit proper Expert Reports within thirty (30) days of the completion of Plaintiffs' fact discovery.

WHEREFORE Plaintiffs request an Order of the Court to Amend the August 27, 2019 Scheduling Order to extend the deadlines set forth therein by an additional sixty (60) days; further, Plaintiffs request that said Amended Order requiring Plaintiffs to submit their Expert Reports by January 10, 2020 be instead amended to grant Plaintiffs leave to file Expert Reports within thirty (30) days of completion of Plaintiffs' fact discovery; and for such further Orders as this Court deem just and proper in the premises.

Respectfully submitted,
Manley, Karraker & Karraker, P.C.

/s/ Vonne L. Karraker
Vonne L. Karraker, MBE #56335
110 S. Jefferson Street
P. O. Box 454
Farmington, MO 63640
Telephone: 573-756-6446
Facsimile: 573-756-5151
vonne@semoelderlaw.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2020, a true and accurate copy of the foregoing document was served, via the CM/ECF system, to the following counsel of record: Michelle Stallings at michelle@hellmichhillretter.com and to William Hellmich via email at bill@hellmichhillretter.com .

/s/

Vonne L. Karraker
